

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

SHANTA LYNETTE BROWN, )  
and )  
AQUASHA SANDIDGE, )  
Plaintiffs, )  
v. ) Civil Action: 6:23cv00054  
THE CITY OF LYNCHBURG, *et al.*, )  
Defendants. )

**DEFENDANTS REED, Z. MILLER, AND R. MILLER'S**  
**MOTION FOR SUMMARY JUDGMENT**

Defendants Seth Reed, Zachary Miller, and Robbin Miller, by counsel, respectfully move for summary judgment on all of the Plaintiffs' claims against them pursuant to Rule 56 of the Federal Rules of Civil Procedure. The grounds for this motion are more fully set out in the memorandum in support filed contemporaneously with this motion.

WHEREFORE, Defendants Seth Reed, Zachary Miller, and Robbin Miller respectfully request that the Court enter summary judgment in their favor and dismiss the claims against them with prejudice.

SETH REED, ZACHARY MILLER, and  
ROBBIN MILLER

By /s/ John R. Fitzgerald  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>th</sup> day of November, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

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